

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHAWANDA HUTSON,

Plaintiff,

v.

CHICAGO STEAM BASKETBALL, LLC,

Defendant.

Case No. 14-cv-01674

Honorable John Z. Lee

**MOTION FOR ORDER TO SHOW CAUSE**

NOW COMES the Plaintiff, SHAWANDA HUTSON, by and through her undersigned attorneys, and in support of her Motion for an Order to Show Cause, states as follows:

1. Plaintiff initiated these proceedings on March 11, 2014, seeking recovery from Defendant, CHICAGO STEAM BASKETBALL, LLC, for violations of Title VII and violations of the Illinois Wage Payment and Collection Act.
2. On October 10, 2014, this Court entered a judgment against the Defendant in the amount of \$22,230.00. That judgment remains unsatisfied.
3. On July 7, 2015, this Court granted Plaintiff's Motion for the issuance of a citation to discover the Defendant's assets.
4. On July 9, 2015, Plaintiff mailed the Citation and the Rider to the Citation (*see* Exhibit 1, attached), via FedEx, to Ron Hicks, the owner of the corporation, at the corporation's address, as well as to the corporation's agent of service, United States Corporation Agent, via FedEx. *See* Exhibit 2, attached. Plaintiff also formally served the Citation and Rider via a licensed process server and received confirmation that the documents were signed for by a

secretary for the corporation, who indicated she was authorized to accept service. *See Exhibit 3* (attached).

5. On August 4, 2015, Plaintiff mailed a letter to Ron Hicks (President and Owner of Defendant) and to United States Corporation Agent, advising the Defendant to respond to the Citation to Discover Assets or Plaintiff would proceed with the present Motion. *See Exhibit 4* (attached).

6. To date, the Defendant has not replied or responded in any way to Plaintiff's Requests and has not provided any documents in response.

WHEREFORE, Plaintiff, SHAWANDA HUTSON, respectfully requests as follows:

1. That the Court grant the Motion for the Issuance of an Order directing the Defendant to Show Cause as to why it should not be held in contempt of court for its failure to respond to a Citation to Discover Assets served upon it as provided by law.
2. That Defendant be ordered to produce all books, papers, or records set forth in the Citation to Discover Assets within the next 14 days.
3. That the Court grant any other relief it deems just and necessary.

RESPECTFULLY SUBMITTED,

By: /s Maryam Arfeen  
Attorney for Plaintiff

**LEONARDMEYER LLP**

Michael I. Leonard  
Ethan E. White  
Maryam Arfeen  
203 N. LaSalle Street, Suite 1620  
Chicago, Illinois 60601  
(312) 374-8084 (direct)  
(312) 264-0671 (fax)  
marfeen@leonardmeyerllp.com

# **Exhibit 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHAWANDA HUTSON,

Plaintiff,

v.

CHICAGO STEAM BASKETBALL, LLC,

Defendant.

Case No. 14-cv-01674

Honorable John Z. Lee

**CITATION TO DISCOVER ASSETS**

**TO: CHICAGO STEAM BASKETBALL, LLC**

YOU ARE COMMANDED to appear before Judge Lee or any other judge sitting in his stead in room 1226 of Northern District of Illinois Federal Courthouse, Everett McKinley Dirksen Building, 219 S. Dearborn St., Chicago, Illinois on **AUGUST 24, 2015 at 9:00 AM** to be examined under oath to discover assets or income not exempt from the enforcement of the Judgment.

A judgment against Chicago Steam Basketball, LLC ("Judgment Debtor") was entered on October 10, 2014 and \$22,230.00 remains unsatisfied.

YOU ARE COMMANDED to produce at the examination:

SEE ATTACHED DOCUMENT RIDER

and all books, papers, or records in your possession or control which may contain information concerning the property or income of, or indebtedness due Judgment Debtor.

YOU ARE PROHIBITED from making or allowing any transfer or other disposition or, interfering with, any property not exempt from execution or garnishment belonging to the Judgment debtor or to which the Judgment Debtor may be entitled or which may be acquired by or become due to the Judgment Debtor and from paying over or otherwise disposing of any money not so exempt, which is due the Judgment Debtor, until the further order of court or termination of the proceedings. You are not required to withhold the payment of any money beyond double the amount of the balance due.

**WARNING: YOUR FAILURE TO APPEAR IN COURT AS HEREIN DIRECTED MAY CAUSE YOU TO BE ARRESTED AND BROUGHT BEFORE THE COURT TO ANSWER TO A CHARGE OF CONTEMPT OF COURT, WHICH MAY BE PUNISHABLE BY IMPRISONMENT IN THE COUNTY JAIL. YOUR FAILURE TO COMPLY WITH THE CITATION PROCEEDING MAY RESULT IN A JUDGMENT BEING ENTERED AGAINST YOU FOR THE UNSATISFIED AMOUNT OF THE JUDGMENT. 735 ILCS 5/2-1402(c)(1)**

**CERTIFICATE OF ATTORNEY OR JUDGMENT CREDITOR**

In the United States District Court for the Northern District of Illinois, on October 10, 2014, a judgment in the amount of **\$22,230.00** was entered in favor of SHAWANDA HUTSON and against CHICAGO STEAM LIMITED, LLC in Case No. 14-cv-01674 and a balance of **\$22,230.00** remains unsatisfied.

I, the undersigned, certify to the Court, under penalties as provided by law pursuant to 735 ILCS 5/1-190 that all information stated herein is true.

By: /s Maryam Arfeen  
Maryam Arfeen  
One of Plaintiff's Attorneys

Atty. No: 6316640  
Name: Maryam Arfeen  
Address: 203 N. LaSalle, Suite 1620  
City/State/Zip: Chicago, IL 60601  
Telephone: (312) 374-8084

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHAWANDA HUTSON,

Plaintiff,

v.

CHICAGO STEAM BASKETBALL, LLC,

Defendant.

Case No. 14-cv-01674

Honorable John Z. Lee

**RIDER TO CITATION TO DISCOVER ASSETS**

**YOU ARE COMMANDED** to produce at the examination all books, papers, documents, or records in your possession over which you have control, which may contain information concerning all property and assets of Chicago Steam Basketball, LLC, including but not limited to:

1. Any and all monthly, quarterly, annual and/or all other accounting and financial statements, including but not limited to payroll and accounts receivable records, prepared by or on behalf of Chicago Steam Basketball, LLC for the past three years.
2. Any and all information regarding any and all stocks, funds, bonds, securities and/or other investments or other assets held, gained, sold or lost by Chicago Steam Basketball, LLC, or otherwise associated with Chicago Steam Basketball, LLC in any way for the past three years;
3. Any and all information regarding all bank, money or other financial accounts, including but not limited to bank statements and check ledgers, in the name of Chicago Steam Basketball, LLC, and/or its officers and/or directors, along with such information for Chicago

Steam Basketball, LLC's subsidiaries, successors or other related entities; for all such information, provide the name of the accounts, account numbers, amount of money currently held in each account and monthly statements for each said account for the past three years;

4. Copies of all income tax returns filed for the past three years, on behalf of Chicago Steam Basketball, LLC, along with copies of any and all tax refund checks issued during these years, and any and all information regarding how such refund money was used and/or where such money was held and is currently being held, whether by Chicago Steam Basketball, LLC and/or any other entity or individual affiliated or associated in any way with Chicago Steam Basketball, LLC;

5. Any and all information regarding any and all loan documents related to Chicago Steam Basketball, LLC, including any and all documents related to any receipts or disbursements of money related to such loans, for the past three years.

6. A list of all assets regardless of their present location.

7. A list of all liabilities regardless of their present location.

8. Audited financial statements for the last five years.

SHAWANDA HUTSON

By:

---

One of Her Attorneys

LeonardMeyer LLP  
Michael I. Leonard  
Ethan E. White  
Maryam Arfeen  
203 North LaSalle Street  
Suite 1620  
Chicago, Illinois 60601  
(312) 283-0747

# **Exhibit 2**



NOT A SHIPPING FORM. PROCESS IN CENTER ONLY. NOT A SHIPPING FORM. PROCESS IN CENTER ONLY.

**FedEx**  
Ground

**Order Form**  
**Must be processed at a FedEx shipping counter.**

**Sender's Copy**

<b>1 From</b> <input checked="" type="checkbox"/> <small>Please print and press hard.</small> Date <b>7/9/15</b> Company <b>LEONARD MEYER LP</b> Account Number <b>C47800467</b> Address <b>203 N. LASALLE, SUITE 1620</b> City <b>CHICAGO</b> State <b>IL</b> Zip <b>60601</b> <small>Dept/Floor/Suite/Room</small>	
<b>2 To</b> Recipient's Name <b>AGENT OF SERVICE</b> Phone ( <b>1</b> ) Company <b>UNITED STATES CORPORATION AGEN</b> Address <b>SOON. MICH. AVE, STE 600</b> <small>No P.O. Boxes</small> Address <b>CHICAGO</b> <small>State</small> <b>IL</b> <small>Dept/Floor/Suite/Room</small> <small>ZIP/Postal Code <b>60611</b>  </small>	
<input type="checkbox"/> <b>HOLD at Location</b> <small>FedEx Office address REQUIRED.</small>	
<b>3 Package Information</b>	
<input type="checkbox"/> Residential Delivery Address <input checked="" type="checkbox"/> Nonresidential (Business) Delivery Address Number of Packages <b>1</b> Weight <b>Weight</b> <small>Our liability is limited to \$100 per package unless you declare a higher value. See back for details. Declared value of \$500 or more will default to Direct.</small> <small>Signature required. For multiple packages to one delivery address, see the shipping agent to declare a value for each package.</small>	

<b>4 Delivery Signature Options</b> <input checked="" type="checkbox"/> <b>Direct Signature</b> <small>If you require a signature, check Direct or Indirect.</small> <input type="checkbox"/> <b>Indirect Signature</b> <small>Check this box if you do not want to obtain a signature for delivery.</small> <small>Anytime at the delivery address may sign for delivery. Fee applies.</small> <input type="checkbox"/> <b>Indirect Signature</b> <small>If no one is available at the delivery address, anyone in a neighboring address may sign for delivery. Available for U.S. residential shipments only. Fee applies.</small>							
<b>5 FedEx Home Delivery® Convenient Delivery Options</b> <input type="checkbox"/> <b>FEDEX Date Certain</b> <small>Delivery on specific date you select.</small> <small>Tuesday through Saturday; provided the date is not before the standard delivery time and is within two weeks after it.</small> <small>Fee applies.</small> <input type="checkbox"/> <b>Home Delivery®</b> <small>Delivery between 5:30 and 8:30 p.m. on the scheduled date of delivery. Fee applies.</small> <input type="checkbox"/> <b>Home Delivery®</b> <small>Delivery on a specific date and time you select. We attempt to contact the recipient in advance. Fee applies.</small>							
<b>6 Payment</b> <b>Bill transportation charges to:</b> <input type="checkbox"/> <b>Sender</b> <small>Enter FedEx Acct. No. below.</small> <small>Acct. No. Section will be billed.</small> <input type="checkbox"/> <b>Recipient</b> <input type="checkbox"/> <b>Third Party</b> <input type="checkbox"/> <b>Credit Card</b> <input type="checkbox"/> <b>Cash/Check</b> <small>FedEx Acct. No.</small>							
<b>7 FedEx International Ground Information</b>							
<table border="1"> <thead> <tr> <th>Commodity Description REQUIRED</th> <th>Total Value for Customs USD</th> <th>Value for Customs REQUIRED</th> </tr> </thead> <tbody> <tr> <td><input type="checkbox"/> <b>Sender</b> <small>Acct. No. Section will be billed.</small></td> <td><input type="checkbox"/> <b>Recipient</b></td> <td><input type="checkbox"/> <b>Third Party</b> <small>Acct. No. Section will be billed.</small></td> </tr> </tbody> </table>		Commodity Description REQUIRED	Total Value for Customs USD	Value for Customs REQUIRED	<input type="checkbox"/> <b>Sender</b> <small>Acct. No. Section will be billed.</small>	<input type="checkbox"/> <b>Recipient</b>	<input type="checkbox"/> <b>Third Party</b> <small>Acct. No. Section will be billed.</small>
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<table border="1"> <thead> <tr> <th>FedEx Use Only</th> <th>Base Rate</th> <th>Total Charge</th> </tr> </thead> <tbody> <tr> <td><input type="checkbox"/> <b>Tracking Number</b></td> <td></td> <td></td> </tr> </tbody> </table>		FedEx Use Only	Base Rate	Total Charge	<input type="checkbox"/> <b>Tracking Number</b>		
FedEx Use Only	Base Rate	Total Charge					
<input type="checkbox"/> <b>Tracking Number</b>							
Employee Number <b>5897937</b>							

The FedEx Ground Order Form is for FedEx Ground shipments within the U.S. and for FedEx International Ground shipments from the U.S. to Canada. By using this FedEx Ground Order Form, you agree to the service conditions on the back of the Sender's Copy of this document and in the current FedEx Service Guide, including terms that limit our liability. Hazardous materials cannot be shipped using this FedEx Ground Order Form.

# **Exhibit 3**

14CV1679

**Affidavit of Process Server**

Shawanda Hudson  
Plaintiff/Petitioner

vs Chicago Steam basketball, LLC  
Defendant/Respondent

Case#

Being duly sworn, on my oath, I declare that I am a citizen of the United States, over the age of eighteen and not a party to this action.

Service: I served

with the (documents)

NAME OF PERSON/ENTITY BEING SERVED

Subpoena with \$ witness fee and mileage

X Citation to Discover Assets & Rider

by serving (NAME)

at  Home

Business

on (DATE)

SUSAN ABURAHMEH - Receptionist: Authorize to RECEIVE SERVICE

509 N. Michigan Ave Chicago, IL

7/15/15

at (TIME)

2:30 PM

Thereafter copies of the documents were mailed by prepaid, first class mail on (DATE)

From (CITY) \_\_\_\_\_ (STATE) \_\_\_\_\_

Manner of Service:

By Personal Service  
 By delivering, during office hours, copies at the office of the person/entity being served, leaving same with the person apparently in charge thereof, namely, SUSAN ABURAHMEH - Authorized to Accept Service

By leaving a copy at the defendant's usual place of abode, with some person of the family or a person residing there, of the age of 13 years or upwards, and informing that person of the general nature of the papers

By posting copies in a conspicuous manner to the address of the person/entity being served.

Non-Service:

After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

Unknown at Address  Evading  Other: \_\_\_\_\_  
 Address does not exist  Service cancelled by litigant \_\_\_\_\_  
 Moved, Left no forwarding  Unable to serve in a timely fashion \_\_\_\_\_

Service Attempts: Service was attempted on: ( ) , ( ) , ( )

DATE TIME DATE TIME DATE TIME

( ) , ( ) , ( ) , ( ) , ( ) , ( )

DATE TIME DATE TIME DATE TIME

Description:

Male  White Skin  Black Hair  White Hair  14-20 Yrs.  Under 5'  Under 100 Lbs.  
 Female  Black Skin  Brown Hair  Balding  21-35 Yrs.  5'5"-3"  100-130 Lbs.  
 Brown Skin  Blond Hair  Gray Hair  Mustache  36-50 Yrs.  5'4"-5'8"  131-160 Lbs.  
 Glasses  Yellow Skin  Red Hair  Beard  51-65 Yrs.  5'9"-6'  161-200 Lbs.  
 Red Skin

Over 65 Yrs.  Over 6'  Over 200 Lbs.

OTHER IDENTIFYING FEATURES: \_\_\_\_\_

State of Illinois County of Cook

Subscribed and sworn to before me

A notary public, this 15 day of July, 2015

Notary Public

Trinity McHatten  
SERVED BY

LASALLE PROCESS SERVERS

ILLINOIS PRIVATE DETECTIVE LICENSE# 117-001432



CHARTER MEMBER NATIONAL ASSOCIATION OF PROFESSIONAL PROCESS SERVERS

# Affidavit of Process Server

Shawanda Hudson  
Plaintiff/Petitioner

vs Chicago Steam Basketball, LLC  
Defendant/Respondent

14CV1674  
Case#

Being duly sworn, on my oath, I

declare that I am a citizen of the United States, over the age of eighteen and not a party to this action.

Service: I served

with the (documents)

Subpoena with \$ witness fee and mileage

NAME OF PERSON/ENTITY BEING SERVED

Trinity McHatten

Chicago Steam Basketball, LLC

Citation to Discover Assets & Liens

by serving (NAME)

at  Home

Business

on (DATE)

SUSAN ABURAHMEH (Receptionist) Authorized to Accept Service

500 N. Michigan Ave Chgo, IL  
July 15, 2013 at (TIME) 2:20 pm

Thereafter copies of the documents were mailed by prepaid, first class mail on (DATE)

From (CITY)

(STATE)

Manner of Service:

By Personal Service  
 By delivering, during office hours, copies at the office of the person/entity being served, leaving same with the person apparently in charge thereof, namely, SUSAN ABURAHMEH - Authorized to Accept Service  
 By leaving a copy at the defendant's usual place of abode, with some person of the family or a person residing there, of the age of 13 years or upwards, and informing that person of the general nature of the papers  
 By posting copies in a conspicuous manner to the address of the person/entity being served.

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Service Attempts: Service was attempted on: ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( )

DATE	TIME	DATE	TIME	DATE	TIME	DATE	TIME
( )	( )	( )	( )	( )	( )	( )	( )

DATE	TIME	DATE	TIME	DATE	TIME	DATE	TIME
( )	( )	( )	( )	( )	( )	( )	( )

Description:  Male  White Skin  Black Hair  White Hair  14-20 Yrs.  Under 5'  Under 100 Lbs.  
 Female  Black Skin  Brown Hair  Balding  21-35 Yrs.  5'-5'3"  100-130 Lbs.  
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  Red Skin  Red Hair  Beard  Over 65 Yrs.  Over 6'  Over 200 Lbs.

OTHER IDENTIFYING FEATURES: \_\_\_\_\_

State of Illinois County of Cook

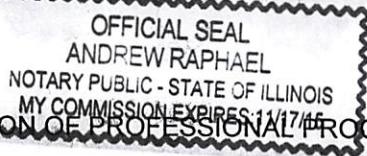
Subscribed and sworn to before me

A notary public, this 15 day of July, 2015

Notary Public

Trinity McHatten  
SERVED BY

LASALLE PROCESS SERVERS  
ILLINOIS PRIVATE DETECTIVE LICENSE# 117-001432



CHARTER MEMBER NATIONAL ASSOCIATION OF PROFESSIONAL PROCESS SERVERS

# **Exhibit 4**

# III LEONARD MEYER

MARYAM ARFEEN  
MARFEEN@LEONARDMEYERLLP.COM  
O 312.374.8084

August 4, 2015

**VIA MAIL**

Chicago Steam Basketball  
c/o United States Corporation Agent  
500 N. Michigan Avenue, Suite 600  
Chicago, IL 60611

Re: *Hutson v. Chicago Steam Basketball, LLC*, Case No. 14-cv-01674 - Citation to Discover Assets

To Whom It May Concern:

On July 9, 2015, Chicago Steam Basketball, LLC was served with a Citation to Discover Assets and a Document Rider, pursuant to Judge Lee's July 7, 2015 Order granting Ms. Hutson's Motion for the Issuance of Citation to Discover Assets. In the event that we do not have your compliance with the Citation by August 24, 2015, we will file the appropriate motion, to show cause, to be heard on the following Wednesday, September 3, 2015. Please contact our office regarding Defendant's anticipated compliance with Judge Lee's Order as soon as possible.

Sincerely,



Maryam Arfeen

# LEONARD MEYER

MARYAM ARFEEN  
MARFEEN@LEONARDMEYERLLP.COM  
O 312.374.8084

August 4, 2015

**VIA MAIL**

Chicago Steam Basketball  
c/o CEO/Owner Ron Hicks  
500 N. Michigan Avenue, Suite 600  
Chicago, IL 60611

Re: *Hutson v. Chicago Steam Basketball, LLC*, Case No. 14-cv-01674 - Citation to Discover Assets

Dear Mr. Hicks:

On July 9, 2015, Chicago Steam Basketball, LLC was served with a Citation to Discover Assets and a Document Rider, pursuant to Judge Lee's July 7, 2015 Order granting Ms. Hutson's Motion for the Issuance of Citation to Discover Assets. In the event that we do not have your compliance with the Citation by August 24, 2015, we will file the appropriate motion, to show cause, to be heard on the following Wednesday, September 3, 2015. Please contact our office regarding Defendant's anticipated compliance with Judge Lee's Order as soon as possible.

Sincerely,



Maryam Arfeen